

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE INTERCEPT MEDIA, INC.,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION

Defendants.

Civil Action No. 1:24-cv-01515-JSR

**MOTION FOR ADMISSION
*PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Thomas Kayes hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Plaintiff The Intercept Media, Inc. in the above-captioned action.

I am a member in good standing of the Bar of the State of Illinois and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: June 20, 2024

RESPECTFULLY SUBMITTED,

/s/ Thomas Kayes

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